

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
WOODBIDGE GROUP OF COMPANIES, LLC, <i>et al.</i> <sup>1</sup>	Case No. 17-12560 (BLS) (Jointly Administered)
Remaining Debtors.	
MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of WOODBRIDGE GROUP OF COMPANIES, LLC, <i>et al.</i> ,	Adversary Proceeding Case No. 19-50816 (BLS)
Plaintiff, vs. FRANCES FERNANDEZ, Defendant.	

**PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT**

Plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust (the “Plaintiff”) by and through its undersigned counsel, hereby requests that a default be entered against the defendant Frances Fernandez (“Defendant”), in the above-captioned adversary proceeding based on the details of the *Affidavit of Counsel in Support of Plaintiff's Request for Entry of Default* (the “Affidavit”) filed concurrently herewith, and the *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* with accompanying *Summons* and *Certificate of Service*, attached to the Affidavit as Exhibit 1. A form of *Entry of Default* is attached hereto as Exhibit A.

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

Dated: July 2, 2020

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142)  
Andrew W. Caine (CA Bar No. 110345)  
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*Counsel to Plaintiff Michael Goldberg, in his  
capacity as Liquidating Trustee of the Woodbridge  
Liquidation Trust*